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DAIMLERCHRYSLER CORPORATION
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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION
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11 CARLA CORTES, a minor, by and
through her Guardian ad Litem, ISABEL
12 CORTES GARCIA; ISABEL CORTES
GARCIA; and JUAN CARLOS GARCIA
13 TORRES,

14 Plaintiffs,

15 v.

16 DAIMLER CHRYSLER
CORPORATION, and DOES ONE
17 through ONE HUNDRED,

18 Defendants.
19

CASE NO. C 05-01012 CRB

STIPULATED PROTECTIVE ORDER

20 It is hereby stipulated and agreed, by and between the respective parties hereto and their
21 counsel, that Defendant DaimlerChrysler Corporation will produce for discovery and inspection,
22 the documents DaimlerChrysler Corporation agreed to produce in its written responses pursuant
23 to the following stipulations. Since the materials referred to above may be privileged,
24 confidential, proprietary, contain trade secrets or other confidential research, development or
25 commercial information, or which is otherwise considered protected under applicable law, the
26 discovery and inspection will be conducted pursuant to the following terms, restrictions and
27 conditions.
28

1 1. Information contained therein shall be disclosed only to counsel of record in this
2 action or only to individuals certified by such counsel as employed by or assisting counsel in
3 preparation for, or at the trial of, this action, including experts and their support staff.

4 2. Any such documents or information shall be used only for the purpose of
5 prosecuting this action.

6 3. Any person or firm to whom such documents or information contained therein is
7 to be disclosed shall first be advised by counsel making disclosure that, pursuant to this
8 Protective Order, such person or firm may not divulge any such information to any other person.

9 In the event that any document or the information contained therein is included with, or
10 the contents thereof are in any way disclosed, in any pleading, motion, deposition transcript or
11 other paper filed with Clerk of any Court, such confidential documents or information shall be
12 kept under seal by the Clerk until further order of this Court. Any use of any such document or
13 of information contained therein and any testimony associated with the confidential information
14 contained therein shall be held *in camera* if necessary to prevent disclosure to non-parties, or
15 otherwise under such circumstances as will prevent the inadvertent disclosure of such documents
16 or information, unless the Court orders otherwise upon good cause shown.

17 4. The production of such documents or information by DaimlerChrysler
18 Corporation shall not constitute a waiver of any privilege or other claim or right of withholding
19 or confidentiality which it may have.

20 5. Should Plaintiffs dispute the need for any particular document(s) to be entitled to
21 protection pursuant to this Order, then within forty five (45) days following receipt of said
22 document(s) Plaintiffs shall notify DaimlerChrysler Corporation, through its attorney, of such
23 dispute, following which defendant shall have forty five (45) days to file a motion before the
24 Court requesting a protective order. Any documents or information disputed pursuant to this
25 paragraph will continue to be protected until the Court rules that the document or information is
26 not subject to this Order.

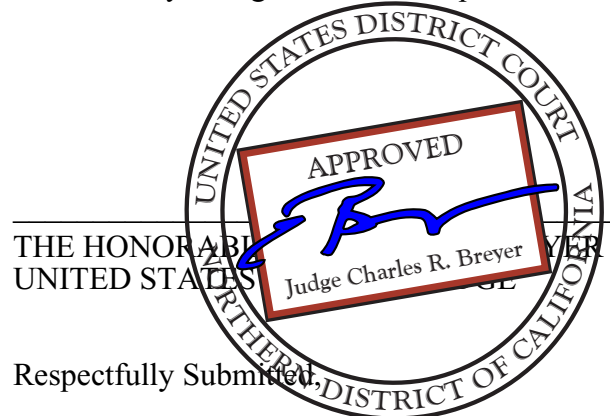
27 6. Upon the termination of this action, all copies furnished by DaimlerChrysler
28 Corporation to Plaintiffs or any other party to this action, together with all originals and copies of

1 notes, sketches, data, compilations, extracts and reproductions furnished by DaimlerChrysler
2 Corporation, shall be returned to counsel for DaimlerChrysler Corporation, or destroyed, together
3 with a letter from Plaintiffs' counsel that all documents or copies of such documents that were
4 provided by DaimlerChrysler Corporation have been returned to DaimlerChrysler Corporation, or
5 destroyed.

6 7. This order may be amended or modified by the agreement of the parties and/or
7 further order of this Court.

8 **IT IS SO ORDERED.**

9 DATED: August 22, 2005



10 Respectfully Submitted,

11 WALKUP, MELODIA, KELLY, WECHT &
12 SCHOENBERGER

13 By: Douglas Saeltzer
14 Douglas Saeltzer
15 Attorneys for Plaintiffs, a minor, by and through
16 her Guardian ad Litem, ISABEL CORTES
17 GARCIA; ISABEL CORTES GARCIA; and
18 JUAN CARLOS GARCIA TORRES

19 DATED: August 19, 2005

20 SEDGWICK, DETERT, MORAN & ARNOLD LLP

21 By: Peter J. Messrobian
22 Peter J. Messrobian
23 Attorneys for Defendant
24 DAIMLERCHRYSLER CORPORATION

25 I, Peter J. Messrobian, am the ECF User whose ID and password are being used to file
26 this Stipulated Protective Order. In compliance with General Order 45, X(B), I hereby attest that
27 Douglas Saeltzer has concurred in this filing.

28 By: Peter J. Messrobian
PETER J. MESSROBIAN